

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JOSE ANTONIO CORREA ORTIZ  
WANDA IVETTE SERRANOS RAMOS

CASE NO. 11-00543-BKT

CHAPTER 13

Debtor

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**AMENDED APPLICATION FOR ATTORNEY'S**

**FEES**

TO THE HONORABLE COURT:

COMES NOW, WILLIAM DAVILA DE PEDRO, ESQ. AND EMILY D DAVILA, ESQ. ("applicants"), which respectfully request compensation pursuant to Section 330 of the United States Bankruptcy Code. All services performed and/or expense incurred where for the benefit of the debtor and necessary for the administration of the case. As required by Bankruptcy Rule 2018(a), the undersigned attorney on behalf of the aforementioned law firm sets forth a detailed statement of the services rendered, time expended and the amount requested:

**CASE ADMINISTRATION CHAPTER 13**

<b>DATE</b>	<b>DESCRIPTION</b>	<b>P/H</b>	<b>TIME</b>	<b>AMOUNT</b>
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06/30/10	Interview with debtors, re: evaluate economic situation, income, expenses, debts, pending Civil Suits, pending business documents, tax returns filed, pending tax returns, estimate priorities regarding taxes. Determine value of assets and estimated liabilities for plan to be offered to creditors, feasibility of the plan, etc... Contract with debtors: re: attorney fees and expenses.	\$200.00	2 hrs	\$ 400.00
W.D.D.				
09/01/10	Organize, verify documents tendered by debtor, letter to debtors:, re: pending documents ; tax returns, CRIM certification, detailed list of equipment & inventory, income & expenses for prior 6 months with evidence, mortgage letter indicating arrears & balance.	\$200.00	.50 hr	\$ 100.00
W.D.D.				
09/13/10	letter to debtors:, re: pending documents ; tax returns, income & expenses for prior 6 months with evidence & pending business documents.	\$200.00	.10 hr	\$ 20.00
W.D.D.				
11/4/10	letter to debtors:, re: pending documents ; tax returns, income & re-do business income & expense report as required with attached evidence.	\$200.00	.10 hr	\$ 20.00
E.D.D.				
1/27/11	prepare and file Voluntary Petition, Compensation Statement of Attorney for the Debtor, , Address Master List and Credit Counseling Certificate)	\$200.00	2 hr	\$ 400.00
WD.D.				
01/28/11	Receive & notify debtors of 341 meeting, C/H; and notify debtors of possible dismissal due to incomplete petition & schedules filed pending documents.	\$200.00	.10 hr	\$ 20.00
&				
01/31/11				
E.D.D.				
02/10/11	Organize and review business documents, debts; prepare and file Summary of Schedules, Statement of Financial Affairs, Statement of Intention & Statement of Current Monthly Income.	\$200.00	11 hrs	\$ 2,200.00
&				
02/11/11				
E.D.D.				

02/11/11	Prepare and file Chapter 13 plan. Letter to debtor re: chapter 13 plan and business documents requested, insurance policies requested, etc.	\$200.00	1 hr	\$ 200.00
E.D.D.				
2/18/11	Receive, verify, scan and upload auto insurance premium, professional license, commercial public responsibility & service contracts.	\$200.00	.50 hr	\$ 100.00
E.D.D.				
02/25/11	Amended schedules "b & c" to clarify value of inheritance property	\$200.00	.30 hr	\$ 60.00
W.D.D.				
02/25/11	Verify and upload operating report for the months of October to February 2011 with attached evidence of income and expenses, business questionnaire ; and file with Court MOR for October to December.	\$200.00	3 hr	\$ 600.00
E.D.D.				
3/01/11	341 meeting of creditors.	\$200.00	1 hr	\$ 200.00
E.D.D.				
3/02/11	Receive & notify debtors unfavorable recommendation, pending documents, amendments requested, etc.	\$200.00	.10 hr	\$ 20.00
ED.D.				
3/07/11	Amended schedule B#16 & C, amended plan; and verify & file with Court MOR for January.	\$200.00	1.50 hr.	\$ 300.00
ED.D				
3/08/11	Review, scan & upload to Trustee comparables of real property & Judgment Euro-kool; and review & notify unfavorable recommendation on C/H.	\$200.00	.50 hr	\$ 100.00
E.D.D.				
03/29/11	Review, scan & upload to Trustee copy of plan & mortgage payment & 2009 CRIM tax return.	\$200.00	.20 hr	\$ 40.00
W.D.D.				
3/31/11	Prepare & file reply to Trustee's MTD & request new C/H	\$200.00	.30 hr	\$ 60.00
E.D.D				
4/07/11	Review & file with Court MOR for March; and review, scan & upload to Trustee insurance policies, re:	\$200.00	.50 hr	\$100.00

E.D.D.	motorcycle, autos & commercial public responsibility; and appraisal report regarding real properties.			
04/08/11	Receive & notify debtors, re: unfavorable recommendation on C/H; pending 2010 Federal & State Tax returns &	\$200.00	.10 hr	\$ 20.00
E.D.D.	evidence of closing corporation.			
03/11/11	Application for compensation of fees	\$ 200.00	2 hr	\$ 400.00
E.D.D.				
05/04/11	Review, discuss with Trustee position regarding Application for Compensation of fees; prepare & file reply to Trustee's position; and prepare & file Amended Application	\$ 200.00	1.5 hr	\$ 300.00
05/04/11	<b>TOTAL HOURS AND FEES</b>	<b>\$200.00</b>	28.30 Hr	\$ 5,660.00

That the undersigned counsel understands that the \$200.00 is a reasonable fee per hour to be paid for services rendered in this case. That the undersigned attorneys William Davila De Pedro and Emily D. Davila, respectfully each, have 30 years experience and 11 years experience in bankruptcy practice.

The applicant has not shared nor agreed to share such compensation with anyone.

Taking into consideration the fact that this is a business case, the above detail of time spent estimated at 28.30 hrs at a rate of \$200.00 per hour to date the sum of \$5,660.00 is owed by debtors of which \$1000.00 was paid pre-petition pursuant to 2016 B. The undersigned attorneys respectfully request that the remaining balance of \$4,660.00 be paid by the Trustee's Office from funds on hand.

## NOTICE

**TAKE NOTICE** that if no response to this motion is filed within twenty (21) days, this Honorable Court may grant this motion without an actual hearing.

**VERIFIED STATEMENT**

I HEREBY CERTIFY under penalty of perjury that the above information is correct and services were incurred as stated to the best of my knowledge.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY: that a true and exact copy of the foregoing motion has been filed electronically with the Clerk of the Court using CM/ECF systems which will send notification of such to Chapter 13 Trustee, Alejandro Oliveras, Esq. and all CM/ECF participants and by regular mail copy has been sent to all non CM/ECF participants interested parties to their address of record as per master address list.

**RESPECTFULLY SUBMITTED.**

**IN SAN JUAN, PUERTO RICO, this May, 4 2011.**

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